

# **LARGE BANK**

#### Comptroller of the Currency Administrator of National Banks

Washington, DC 20219

**Public Disclosure** 

November 03, 2005

# Community Reinvestment Act Performance Evaluation

Amarillo National Bank Charter Number: 14206

400 South Taylor, Plaza One Amarillo, TX 79101

Office of the Comptroller of the Currency

Lubbock Field Office 5225 South Loop 289, Suite 108 Lubbock, TX 79424

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

# **Table of Contents**

OVERALL CRA RATING	2
DEFINITIONS AND COMMON ABBREVIATIONS	3
DESCRIPTION OF INSTITUTION	7
SCOPE OF THE EVALUATION	8
FAIR LENDING REVIEW	10
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	11
LENDING TEST	
INVESTMENT TESTSERVICE TEST	20
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

### **Overall CRA Rating**

Institution's CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of **Amarillo National Bank** with respect to the Lending, Investment, and Service Tests:

		narillo National Bank Performance Tests	
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding		Х	Х
High Satisfactory	Х		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

<sup>\*</sup> The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Excellent responsiveness to community development lending needs positively impacts good geographic and borrower distributions of small loans to businesses and adequate geographic and borrower distributions for home purchase loans and home mortgage refinance loans. The bank made qualified community development loans during the evaluation period totaling \$116.8 million, which represent 73.4 percent of Tier 1 Capital.
- The geographic distribution of home improvement loans is excellent. In addition, the
  percentage of the bank's loans in both low- and moderate-income geographies exceeds the
  percentage of owner occupied housing in those geographies. Likewise, the borrower
  distribution of home improvement lending is excellent.
- The level of qualified community development investments, grants, and donations represents an excellent responsiveness to identified community development needs. The bank made qualified investments during the evaluation period totaling \$9.7 million, or 6.1 percent of Tier 1 capital.
- Retail delivery services and community development services are excellent. The percentage of branches and ATMs in low-income geographies exceeds the percentage of the population in those geographies. Service activities demonstrate the bank's strong commitment to its community primarily by providing technical financial expertise and services.

#### **Definitions and Common Abbreviations**

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low-or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an

employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

# **Description of Institution**

Amarillo National Bank (ANB) is an intrastate bank headquartered in Amarillo, Texas. ANB reported total assets of \$1.6 billion and Tier 1 Capital of \$159.1 million representing 9.9 percent of average assets as of June 30, 2005. ANB is a wholly owned subsidiary of Amarillo National Bancorp, Inc. (ANBI). ANBI is a one-bank holding company headquartered in Amarillo, Texas. As of June 30, 2005, ANBI reported assets of \$1.6 billion. ANB has no operating subsidiary activities or relationships.

ANB is a full-service bank offering numerous loan and deposit products. The bank offers residential and commercial real estate mortgage, construction loans, commercial loans, agricultural loans, and consumer loans. As of June 30, 2005, ANB reported total loans of \$1.0 billion comprising 65.5 percent of total assets. The bank's net loan-to-deposit ratio was 79.8 percent. Based on ANB's call report information, the loan portfolio consists of 29.4 percent commercial loans, 21.2 percent agricultural loans, 20.0 percent consumer loans, 18.2 percent residential real estate, 10.2 percent commercial real estate, and one percent other loans. In addition, ANB originates a large volume of residential loans that are sold on the secondary market.

ANB's philosophy is to serve the commercial and private needs of its customers located in its assessment areas. The bank's business strategy emphasizes being the dominant market leader while building and maintaining relationships with its customers. ANB has eleven full-service offices, three drive-up facilities, and 69 proprietary automated teller machines (ATMs). All but one banking office and two ATMs are located in Amarillo. One new branch was opened in Amarillo during the evaluation period. Approximately 94.3 percent of ANB's total deposits and 93.5 percent of total CRA and HMDA reportable loans are accountable to the branches in Amarillo. The remaining percentage of deposits and CRA and HMDA reportable loans originate from the Borger branch located in the Hutchinson County AA. ANB also offers alternative delivery channels including Internet banking at <a href="https://www.anb.com">www.anb.com</a>, Bank-by-Phone telephone banking, and stored value cards.

ANB has two assessment areas (AA) consisting of the Potter-Randall Counties AA, which consists of a portion of the Amarillo MSA, and the Hutchinson County AA, a non-metropolitan area located in the Texas Panhandle. Both AAs meet the requirements of the CRA regulation by including whole geographies. Neither assessment area arbitrarily excludes low- or moderate-income geographies. There are no legal or financial impediments for ANB's ability to help meet the credit, investment, and service needs of its assessment areas. The bank was not involved in any mergers or acquisitions during the evaluation period.

ANB's CRA performance was last evaluated as of September 17, 2001. At that time, the bank's overall level of performance was rated "Satisfactory." A review of OCC records, as well as ANB's CRA Public File, did not reveal any complaints relating to the CRA performance of the bank since the prior evaluation.

# **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

This Performance Evaluation is based on three distinct time periods: January 1, 2001 through December 31, 2002 (2001 – 2002 Evaluation Period), January 1, 2003 through December 31, 2003 (2003 Evaluation Period) and January 1, 2004 through December 2004 (2004 Evaluation Period). The first time period will be evaluated using 1990 Census demographic information and the second and third evaluation periods will use 2000 Census demographic information. Refer to Appendix B for the facts and data.

Conclusions regarding the Lending Test are based on small business and HMDA reportable loans from the 2001 – 2002 Evaluation Period, 2003 Evaluation Period, and 2004 Evaluation Period. Aggregate data to determine market share during 2004 was not available for review and therefore, a market analysis was not used in the analysis of the bank's lending in 2004. For community development loans and the Service and Investment Tests, the evaluation period starts from the ending date of the last CRA evaluation period to the start date of the current CRA examination. This evaluation period is September 18, 2001 through November 3, 2005.

#### **Data Integrity**

A Data Integrity Review was conducted in January 2005 to determine the accuracy of ANB's loan data to be used at this evaluation. Included in the review were samples of HMDA loans made by the bank in the period from January 2001 through September 2004 and CRA small business/small farm loans made from January 2002 through September 30, 2004. Information regarding HMDA and CRA loan data was substantially accurate. Data regarding community development loans, qualified community debt or equity investments, qualified donations, and qualified community development services were also verified. We also reviewed the bank's community development investments and services to ensure they met the definition for community development.

#### Selection of Areas for Full-Scope Review

ANB has designated two AAs that consist of the Potter-Randall Counties AA and Hutchinson County AA. For this evaluation period, we performed full-scope reviews for the Potter-Randall Counties AA. The AA selected for review was the area in which the bank maintains a substantial share of its business. For the 2001 – 2002 Evaluation Period, 93.2 percent of reportable loans and 93.0 percent of deposits were located in the Potter-Randall Counties AA. The 2003 Evaluation Period reflected 93.5 percent of reportable loans and 93.8 percent of deposits were located in the Potter-Randall County AA. In 2004, the Potter-Randall Counties AA reported 93.7 percent of reportable loans and 94.3 percent of deposits. A limited scope review was conducted for the Hutchinson County AA. Refer to the table in Appendix A: Scope of the Examination, for additional information.

#### **Ratings**

The bank's overall rating is based primarily on the area that received a full-scope review. Small business lending was given more weight in the overall conclusions than mortgage products since the bank's primary focus is commercial lending. However, home purchase lending was given more weight than home improvement, and home refinance. No weight was given to multi-family loans and small farm loans based on the limited volume of loans.

#### Other

We conducted two community contacts during this examination. Our goal was to discuss credit needs and community development opportunities in the bank's full-scope AAs. These contacts included a community economic development corporation and a business development agency. The community contacts most commonly cited the continued need for affordable housing and access for small business loans. One contact stressed the importance of local bank participation in economic development lending opportunities designed to create new jobs within the community.

# **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of illegal discrimination or other illegal credit practices.

# **Conclusions with Respect to Performance Tests**

#### **LENDING TEST**

#### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Potter-Randall Counties AA is good.

#### **Lending Activity**

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's lending activity.

The bank's overall lending in all three evaluation periods reviewed is good. Borrower and geographic distribution is good. The bank's lending patterns are reflective of the credit needs of the community. ANB's lending is centered in small business lending representing approximately 62.2 percent of the bank's lending in the Potter-Randall Counties AA. The bank's lending to individuals is centered in home mortgage products representing approximately 36.1 percent of the bank's lending in this AA. Purchase, home improvement, and refinance loans represent 42.7 percent, 14.8 percent, and 42.4 percent, respectively, of all mortgages originated in this AA. Our evaluation is based primarily on performance in the full-scope AA for these products, with an emphasis on small loans to businesses.

The volume of small farm loans and multifamily loans made by the bank is not significant; therefore an analysis of these loans is not meaningful.

ANB ranks first in their market for overall home mortgage and small business lending, as well as, deposit market share in each period. ANB has averaged over 76.5 percent loan-to-deposit ratio since the prior CRA evaluation in September 2001. This level of lending is very comparable to other banks in their AA and is considered reasonable. Based on a review of loans reported, the bank's primary lending product is small loans to businesses followed by home mortgage loans.

Based on 2003 Peer Small Business Data, ANB ranked 1st out of 51 lenders.

Based on 2003 HMDA Peer Mortgage Data, ANB ranked 1<sup>st</sup> out of 223 lenders, with a 17.05 percent market share.

Based on 2003 HMDA Peer Mortgage Data:

- Market share for home purchase, home improvement, and refinance loans is 14.46 percent, 46.05 percent, and 16.78 percent, respectively;
- For home purchase lending, ANB ranked 2<sup>nd</sup> out of 162 lenders;
- For home improvement lending, ANB ranked 1<sup>st</sup> out of 26 lenders; and
- For home refinance lending, ANB ranked 1<sup>st</sup> out of 170 lenders.

2004 Peer Small Business Data and HMDA Peer Mortgage Data were not available at the time of this evaluation.

#### Distribution of Loans by Income Level of the Geography

ANB's overall distribution of loans by income level of geographies is good for small loans to businesses and adequate for home mortgage loans.

#### **Home Mortgage Loans**

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. The volume of multifamily loans made by ANB is not significant, therefore an analysis of these loans is not meaningful.

Geographic distribution for home mortgage lending is adequate when considering performance context factors. There are several factors that limit home purchase and home mortgage refinance lending opportunities in the low- and moderate-income geographies in the Potter-Randall Counties AA.

There has been limited new home construction in low- and moderate-income geographies during the evaluation period. One of the more active homebuilders in low- and moderate-income geographies during the evaluation period has been Habitat for Humanity, which does not rely on traditional bank financing. Most of the new home construction during the evaluation period has occurred in the middle- and upper-income geographies of southwest Amarillo.

For the 2001 – 2002 evaluation period, 1990 census information reflects that low-income census tracts have only 3.7 percent of the AA's owner-occupied units. A total of 63.7 percent of families below the poverty level live in low- and moderate-income tracts, making it difficult for those individuals to qualify for home mortgage loans. In addition, a substantial percentage (43.3 percent) of the AA's low- and moderate-income families reside in middle-income tracts.

For 2003 and 2004 evaluation periods, 2000 census information reflects that low-income census tracts have approximately 3.1 percent of the AA's owner-occupied housing units. A significant percentage of low- and moderate-income families continue to reside in middle-income tracts. Additionally, 61.6 percent of families in low- and moderate-income tracts are below the poverty level.

#### Home Purchase Loans

ANB has an adequate level of home purchase loans for the three evaluation periods in our review considering performance context factors discussed above. ANB's geographic distribution of home purchase loans during the 2001-2002 evaluation period is significantly lower than the level of owner occupied units in low- or moderate-income tracts. However, ANB's market share of home purchase lending is ranked 3<sup>rd</sup> at 9.73 percent in low- and moderate-income tracts. Lending for home purchase loans during 2003 is also lower than the level of owner-occupied units in low- or moderate-income geographies. However, ANB is ranked 2<sup>nd</sup> with 11.2 percent of the total market share in low- or moderate-income tracts. ANB also has better performance in low-income tracts than the overall market share of home purchase loans. The level of home purchase loans during 2004 is lower than the level of owner occupied units in the low- and moderate-income geographies.

#### Home Improvement Loans

ANB's geographic distribution of home improvement loans is excellent. For 2001-2002, lending to borrowers in low-income tracts is near the level of owner-occupied units, and lending in moderate-income geographies significantly exceeds the percentage of owner-occupied units. The market share of loans in these geographies significantly exceeds the bank's overall market share of home improvement loans in the Potter-Randall Counties AA. For 2003, the percentage of bank loans significantly exceeds the level of owner-occupied units in both the low- and moderate-income tracts. The bank's market share in low- and moderate-income tracts greatly exceeds the overall market share of this loan type. For 2004, geographic distribution of ANB's home improvement loans in the Potter-Randall AA exceeds the demographic comparison to owner occupied housing units.

#### Home Mortgage Refinance Loans

ANB's geographic distribution for home mortgage refinance loans is poor. For 2001-2002, the percentage of bank loans is lower than the percentage of owner-occupied units in the low- and moderate-income tracts. Market shares for these geographies are also less than the overall market share. As noted previously, only 35.5 percent of housing units in low-income tracts in the AA are owner-occupied, thereby limiting opportunities for home ownership. However, ANB is ranked 2<sup>nd</sup> with 10.4 percent of the total market share in low- or moderate-income tracts. For 2003, the percentage of bank loans for the refinance of a home mortgage is lower than the percentage of owner-occupied units in low- and moderate-income tracts. The bank's market share of loans in low- and moderate-income geographies is also lower than the bank's overall market share of home mortgage refinance loans in the AA. Lending in low-income tracts is hampered by the limited availability of housing units in the AA. For 2004, the percentage of loans in low- and moderate-income geographies is somewhat lower than the level of owner occupied units in low- and moderate-income tracts.

#### Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Overall, geographic distribution of ANB's small loans to businesses is good. During 2001-2002, the distribution of small loans to businesses significantly exceeds the level of businesses in moderate-income geographies. ANB's market share in the moderate-income tracts is also significantly above the bank's overall market share. This performance reflects the concentration of used vehicle dealers that are located in these geographies. ANB provides inventory financing for these borrowers on a per unit basis rather than with a line of credit. This contributes to the bank's lending performance for this product and geography being higher than would otherwise be the case. The percentage of the bank's small business loans to borrowers in low-income geographies is lower than the percentage of small businesses in those geographies.

For 2003, the level of small loans to small businesses in low- and moderate-income tracts is adequate. The market share for this product in moderate-income tracts exceeds the overall market level of loans in the AA, while the market share for low-income tracts is near to the bank's overall market share. In 2004, ANB's percentage of small loans to businesses in low-income geographies is somewhat lower than businesses in low-income geographies and near to the level of businesses in moderate-income tracts.

#### **Lending Gap Analysis**

Our review of the geographic distribution of loans did not detect any conspicuous or unexplained gaps in ANB's lending patterns.

#### Inside/Outside Ratio

We performed an analysis of ANB's lending within its AAs at the bank level as opposed to the individual AA levels. ANB originated a substantial majority of its small loans to businesses and home mortgage loans within the bank's AAs. During the evaluation period, ANB originated 95.4 percent of its business and home loans to borrowers in their AAs. For small business loans, 97.4 percent loans originated during the evaluation period were within the bank's AA. For home mortgage products, 88.3 percent of all loan originations during the evaluation period were within the bank's AAs. This performance had a positive factor in the overall performance of the geographic distribution of lending by income level of geography.

#### Distribution of Loans by Income Level of the Borrower

ANB's overall distribution of lending by income levels of the borrower is good.

#### Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

ANB's borrower distribution for home mortgage lending is good when considering the difficulty that low- and moderate-income individuals have in purchasing a home in the AA. The median cost of housing in the AA has increased significantly as compared to the increase in median family income levels.

Using 1990 census data, the median cost of housing in the AA is \$54,547. The HUD updated median family income for 2002 was \$44,800. A low-income individual earns less than \$22,400. A moderate-income individual earns at least \$22,400 but less than \$35,840. Additionally, 15.0 percent of the families are below poverty level. According to 2000 census data, the median cost of housing in the AA has risen to \$75,771. The HUD updated income for 2003 and 2004 is \$48,100 and \$50,500, respectively.

#### Home Purchase Loans

For 2001-2002, the percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA. Also, the percentage of loans to moderate-income borrowers is somewhat lower than the level of moderate-income families in the AA. Approximately 20.61 percent of families in the AA are low-income and 17.71 percent are moderate-income. It is very difficult for families living below the poverty level to qualify for home purchase mortgages. However, the bank's market share for low-income loans is near the overall market share and somewhat lower for moderate-income loans. This performance is adequate when considering the affordability of housing for a low-income individual discussed above.

The percentage of home purchase loans in 2003 to low-income families is lower than the level of low-income families in the AA. However, ANB's market share of loans to low-income borrowers exceeds the bank's overall market share of home purchase loans. The percentage of home purchase loans to moderate-income families is near the level of moderate-income families. ANB's market share of these loans is near to the overall market share for this

product, reflecting good performance. For 2004, ANB's borrower distribution of home purchase loans in the Potter-Randall AA is good. Lending to low-income borrowers is lower than the demographic comparison, but lending to moderate-income borrowers is near to the level of moderate-income families. No market share information is available for the product for 2004.

#### **Home Improvement Loans**

Borrower distribution of home improvement lending is excellent when considering the affordability of housing in the AA, as described above. For 2001-2002 and 2003, the percentage of home improvement loans to low-income borrowers is near the percentage of low-income families in the AA. Also, the percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. ANB's market share for low- and moderate-income borrowers significantly exceeds the overall market share of home improvement loans. No market share data is available for 2004, but the borrower distribution for home improvement loans is excellent, exceeding the level of low- and moderate-income families in the AA.

#### Home Mortgage Refinance Loans

Borrower distribution of home refinance loans is adequate considering performance context issues previously discussed. For 2001-2002, the percentage of home purchase loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. Also, the percentage of loans to moderate-income borrowers is lower than the level of moderate-income families in the AA. ANB's market share of home refinance loans to moderate-income borrowers is near the overall market share these loans, while the market share to low-income borrowers is somewhat lower.

For 2003, ANB's borrower distribution for home refinance loans is adequate. The bank's percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. However, the bank's market share in both the low- and moderate-income individuals exceeds or is very near the overall market share for this product. ANB has excellent borrower distribution during 2004 for home refinance loans to moderate-income borrowers. The performance for low-income borrowers is lower than the percentage of low-income families in the AA.

#### Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good when considering the method in which the bank finances a relatively small number of used motor vehicle dealers. ANB provides inventory financing on a note-by-note basis, rather than using a single line of credit. This method of financing significantly increases the total number of loans originated. Most of the highest volume motor vehicle dealers the bank finances have revenues greater than \$1 million. As a result, the percent of loans to small businesses (those with revenues of \$1 million or less) to total loans is lower than if the bank used the line of credit method for its high volume dealers.

The borrower distribution of small loans to small businesses is lower than the percentage of small businesses for all evaluation periods. For 2001 - 2002, when this data is adjusted for the

largest used motor vehicle dealers, the bank's percentage of loans increases from 33.34 percent to 69.80 percent, resulting in good performance. The 2003 borrower distribution of small loans to businesses percentage increases from 32.60 percent to 74.40 percent reflecting excellent performance. For both the 2001 –2002 and 2003 evaluation periods, the market share for small loans made to small businesses is near to ANB's overall performance. ANB's performance for borrower distribution of small loans to small businesses in 2004 is adequate considering the dealer loan performance context. No market share data is available for 2004. For all evaluation periods, the distribution by size of loan shows that a majority of the loan originations are for \$100,000 or less. This is another indication that business lending is primarily to small businesses.

#### **Community Development Lending**

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development (CD) lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

ANB's lending for purposes reflects an excellent level of responsiveness to the needs of the community. CD lending performance in the Potter-Randall Counties AA had a positive impact on the Lending Test performance. The bank made 96 qualified community development loans totaling \$116.8 million during the evaluation period. This equals 73.4 percent of Tier 1 Capital. Excluding renewals, community development loans totaled \$59.6 million or 37.4 percent of Tier 1 Capital. Included in the total CD lending are ten loans totaling \$11.7 made in an enterprise zone outside of the bank's AA. Many of the loans promote activities, such as affordable housing, that have a positive impact on the AA. In addition, some CD lending provided for or ensured the availability of jobs for low- or moderate-income individuals. CD lending is not considered innovative or complex, but the amount of loans that benefit the community, specifically low- or moderate-income persons or areas, is commendable.

Examples of community development loans and commitments are highlighted below.

- ANB originated three loans totaling \$17.5 million to a local non-profit organization, which
  owns and operates retirement centers, a nursing home, and a family-oriented health
  fitness center. The loans financed the construction of a 120-bed nursing facility in
  Amarillo that will provide care for low- and moderate-income senior adults. The project
  is located in a moderate-income census tract.
- ANB originated ten loans totaling \$11.7 million to finance the construction of a dairy located in a regional enterprise zone. The proceeds of this loan will revitalize and stabilize a moderate-income geography chosen by the state government. The Immigration and Naturalization Service approved the dairy for the "Immigration through Investment" program. This designation requires that an investment be made in a "targeted employment area", and that full-time employment for not fewer than 10 individuals be created.
- One loan totaling \$11 million was made to an assisted living center located in a moderate-income census tract. In addition to revitalizing and stabilizing a moderateincome tract, the center supports permanent job retention by creating 33 new full-time

positions for persons earning wages of \$8 or less an hour. The living center provides a homelike atmosphere to elderly and disadvantaged Medicaid patients.

- ANB originated seven loans totaling \$1.5 million to an Adult Day Care Center, which
  provides primary care to elderly and disabled clients. The majority of the patients are
  low- or moderate-income individuals who qualify for Medicaid or Medicare. The center
  is licensed to provide services to 150 patients.
- Fifteen loans totaling \$562 thousand were made to a nonprofit organization, which
  provides multi-disciplinary programs to serve the needs of people with disabilities.
  These loans provided funds for annual operating expenses. The organization provides
  vocational and residential opportunities to clients with a variety of physical and
  developmental disabilities. Virtually all clients are unemployed or have minimal income.
- ANB originated five loans totaling \$805 thousand to a local homebuilder for a housing project designed to provide affordable housing to low- to moderate-income families and individuals. The loans provided interim construction financing to construct 12 singlefamily homes located in a moderate-income census tract. With these loans, ANB has helped to meet the community's needs for stabilization of low- to moderate-income geographies and for affordable housing in the AA.
- Additionally, ANB made two loans totaling \$70 thousand to a nonprofit agency located in a low-income census tract that provides outpatient rehabilitative services. This organization targets low- or moderate-income clients and focuses on alcohol and drug rehabilitation along with several educational programs. This agency also provides alcohol and drug awareness and prevention programs to the community.

### **Product Innovation and Flexibility**

Product innovation and flexibility had a neutral impact on the Lending Test conclusion. ANB did not introduce any innovative lending practices during the evaluation period. However, the bank does have several lending programs that meet the affordable housing credit needs of low- and moderate-income individuals. These flexible lending practices include down payment assistance, and first-time homebuyer assistance.

#### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the lending test in the Hutchinson County AA is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test. Refer to Tables 1 through 13 in Appendix C for the facts and data that support these conclusions.

#### **INVESTMENT TEST**

#### **Conclusions for Areas Receiving Full-Scope Reviews**

ANB's performance under the investment test is rated "Outstanding." Based on a full-scope review, the bank's performance in the Potter-Randall Counties Assessment Area is significant given the size and resources of the bank. Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

The bank's volume of qualified investments was excellent, given the bank's size and capacity as well as the moderate level of CD opportunities in the AA. During the evaluation period, Amarillo NB made equity investments, donations, and contributions that totaled \$9.7 million in qualified investments representing 6.1 percent of Tier 1 Capital. Included in this total are \$8.4 million of unfunded equity investments in which the bank had legal binding commitments as of the examination date. These investment vehicles consist of a revenue bond of \$6.4 million and two \$1 million mortgage backed securities. The equity investments were funded during the examination. In addition to the equity investments, the bank had individual contributions and donations totaling \$914 thousand. The bank had approximately \$328 thousand in prior period investments that were still outstanding at the end of the current evaluation period.

ANB has demonstrated a leadership role in several CD projects in the AA that has lead to participation by other agencies and organizations. These projects have addressed affordable housing, community needs for the rehabilitation of low- and moderate-income neighborhoods, and community services. Although the investments are not considered innovative or complex, the number and volume of investments reflect ANB's efforts to support community services targeted to low- and moderate-income individuals and geographies. Specific examples of donations to qualifying community development organizations are described below.

#### **Equity Investments**

- The Amarillo-Potter Revenue District Bond totaling \$6.4 million represents the renewal of funds used to construct the Amarillo National Center, which is a livestock arena at the county fairgrounds, and to construct a new livestock staging facility. The Amarillo National Center opened in August 2000 and hosts rodeo, equine and livestock events. It is anticipated that the expansion will attract additional events and allow the facility to host events that they otherwise would not have the capacity to accommodate. Attendance at the ANC is estimated at more than 200 thousand people annually and has had a five-year economic impact for the city of Amarillo of approximately \$27 million. Employees who will be working in the facility are considered low- and/or moderate-income individuals based on their hourly wages.
- ANB purchased two mortgage-backed securities totaling \$2 million. The collateral consists of 26 home purchase loans primarily located in Amarillo and San Antonio. Sixteen or 61.5 percent of the loans are in the Potter-Randall Counties AA. Twenty-four of the loans representing 78.9 percent of the loan dollars are to LMI families, and 14 loans representing 52.5 percent of the total loan dollars are to families who live in moderate-income census tracts. These two pools were created exclusively for ANB.

#### Amarillo College Foundation (ACF)

The Amarillo College Foundation sought to expand the number of adult students to whom services could be offered under the Adult Students & Women's Services Endowed Scholarships. As a result, ANB initiated the Amarillo National Bank Adult Student Fund to provide community services that target and enable low- and moderate-income adults to further their education or to enter new job fields. Most of these students are pursuing associate degrees or certificates predominately in allied health, nursing, and business. ANB donates \$18 thousand annually to this fund. Guidelines for awarding the scholarships require that the

applicants must be low- to moderate-income adults, living within an Amarillo geography designated by the City of Amarillo as a low- or moderate-income area. For the Fall 2005 school semester, approximately 51 percent of the recipients resided in moderate-income census tracts.

#### Catholic Family Services (CFS)

This nonprofit agency provides social services targeted to low- and moderate-income individuals including affordable housing, food assistance, youth centers, runaway and troubled teen shelter, refugee citizenship, job-referral, and counseling. In addition to other donations, ANB provided the funds to the non-profit agency to purchase property to begin the Seventh Street Affordable Housing Project. This housing development, which is located in the northern portion of Amarillo, and is situated in a moderate-income census tract, will provide new affordable single-family housing.

#### High Plains Food Bank (HPFB)

The nonprofit organization provides community services by providing food to 172 agencies including food pantries, soup kitchens, and daycare dining facilities that serve low-income individuals throughout the Texas Panhandle region. Through the monthly distribution of grocery products, the HPFB continues to aid over 62 thousand residents in the Texas and Oklahoma panhandles who live at or below poverty level. In 2005, the bank specifically made donations to HPFB to assist individuals affected by Hurricane Katrina.

#### Opportunity School (OS)

The mission of OS is to provide high quality developmental education and parent support for young children from low-income families to enable them to become lifelong learners and contributors to society. OS is a precursor for young children living in poverty to achieve high school graduation, increased earnings, and home-ownership as adults, and increased commitment to marriage. Extended daycare is available for parents who work, with bus transportation provided. A significant majority of the children and families served are low-income.

#### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the investment test in the Hutchinson County AA is weaker than the bank's overall "Outstanding" performance. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

Approximately 0.30 percent of ANB's qualified investments were in Hutchison County, which is predominately a rural and upper-income community. Weaker performance in Hutchinson County did not affect the overall "Outstanding" rating. While opportunities for direct investments in Hutchinson County are limited, the needs of low- and moderate-income individuals have not been neglected. Many of ANB's donations and contributions were to agencies and organizations that serve not only Potter and Randall Counties, but the entire Panhandle region, including Hutchinson County.

#### SERVICE TEST

#### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated "Outstanding" for the evaluation period. Based on a full scope review, the bank's performance in the Potter/Randall AA is excellent. The rating is primarily based on the geographic distribution of full-service banking offices and ATMs, and the strong commitment to community development services in the Potter/Randall AA.

#### **Retail Banking Services**

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

#### Branch Delivery System and Branch Opening and Closings

The primary distribution systems for banking products are full-service banking offices. These offices are readily accessible to all income geographies and individuals. As November 4, 2005, sixty-six proprietary ATMs supplement the ten full-services branches. Thirteen ATMs have opened since the last evaluation period. One branch has opened, and no branches have closed.

According to the 1990 census, the bank's branch distribution in low-income census tracts is excellent with 33.3 percent of the bank's branches located in these geographies. This distribution significantly exceeds the percentage of the AA population residing in low-income census tracts at 5.5 percent. There were three branches located in the low-income census tracts, supplemented by four ATMs. The bank did not have any branches in moderate-income census tracts, however there were 23 ATMs located in these geographies. Branches in other geographies are near to and accessible to individuals residing in moderate-income geographies.

Based on the 2000 census, branch penetration is excellent when compared with the percentage of the AA population in each income level. Forty percent of the bank's branches are located in low- and moderate-income census tracts, compared to 32.1 percent of the population residing in low and moderate-income geographies. ANB has one branch and 3 ATMs located in a low-income geography. Three branches and 25 ATMs are located in moderate-income geographies. One full-service branch opened in an upper-income census tract on December 8, 2003.

Several other alternative delivery systems that augment the branch system include; telephone banking, stored value cards, Visa Check Cards, and Internet banking. In addition to the full-service branches, ANB operates three stand-alone drive-up facilities, one of which is located in a low-income census tract and one in a moderate-income census tract.

#### Reasonableness of Business Hours and Services

Banking hours provide more than reasonable accessibility throughout the AA. All branch locations have standard banking hours Monday-Friday with extended evening hours on Friday. There are extended evening and weekend hours at the convenience store and supermarket branch locations. The convenience store branch is located in a moderate-income census tract.

Products and services are consistent throughout the AA and offered at all full-service branch locations in the AA. ANB does not offer any products or services that solely target LMI individuals or geographies, although they are successful in reaching these individuals. These products and services include low loan down payment programs to help individuals qualify for mortgage loans and free check cashing services to 84 businesses in the assessment area.

ANB offers a no minimum balance checking account, called "FREE Checking" to customers, including those that are low- and moderate-income, which allows these individuals to maintain regular checking accounts. There are no other maintenance or check-writing fees associated with the FREE Checking account. ANB's FREE Checking account also has immediate \$100 overdraft protection, which increases to \$500 after 30 days.

#### **Community Development Services**

During the evaluation period, ANB exhibited an excellent responsiveness to the community development service needs in the Potter-Randall Counties AA. The bank has met this need primarily by providing financial services that take advantage of bank employees' financial expertise. Community development activities are responsive to the needs of low- and moderate-income individuals. The following activities were identified that were of high impact and demonstrated strong leadership by the bank in the AA.

<u>Financial Seminars – Financial Literacy</u> – ANB has conducted many seminars at schools located in low- and moderate-income census tracts. The schools impacted include Travis Middle School (moderate-income), Cal Farley's Boy Ranch High School (low-income), and Palo Duro High School (moderate-income). ANB also developed a financial literacy curriculum to be used during the training. The seminars are designed to educate the students on a variety of topics. Issues discussed include checking and savings accounts, budgeting and credit issues.

In addition to the emphasis placed on financial literacy, ANB officers serve on numerous community development organizations in a direct advisory capacity. Each position relies upon the officer's financial expertise to help the organization provide community development services. These organizations have community development as their primary purpose and/or primarily benefit low- and moderate-income individuals and families. Several of those organizations are detailed below.

- <u>High Plains Food Bank</u> During the evaluation period, ANB personnel have been very involved in providing technical financial expertise to the High Plains Food Bank. The Food Bank acts a clearing-house for free food distribution to low- and moderate-income people in both Amarillo and the surrounding rural counties. Each month, 173 non-profit agencies and churches distribute over 300,000 pounds of food to low and moderate-income individuals.
- Amarillo Area Foundation/Harrington Foundation ANB officers, through their membership on the Executive and Investment Committees, have been instrumental is suggesting and developing initiatives designed to meet the pressing needs within the community. One example is the bank's support of the Achievement through Commitment to Education (ACE) program. This program's primary purposes are to reduce high drop out rates and low scores and to provide college scholarships, primarily for economically disadvantaged high school seniors.

<u>Family Support Services (FSS)</u> - Bank officers have supported the organization's goals
by volunteering and providing technical expertise in fundraising activities. FSS is a
comprehensive, family-based agency providing crisis, and ongoing educational
programs and services. Services offered to low- and moderate-income individuals
include; counseling, education, child-care and thrift store.

• <u>Cal Farley's Boys Ranch</u> – The facility provides a home and education for children with no parental guidance. Over 70 percent of the children are considered low- or moderate-income individuals. Bank officers have offered significant financial expertise as well the placement of an "ANB" Bank at the ranch to encourage the children to save money.

#### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Hutchinson County AA is not inconsistent with the bank's overall "Outstanding" performance under the Service Test In the Potter-Randall Counties AA.

# **Appendix A: Scope of Examination**

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term "full-scope") and those that received a less comprehensive review (designated by the term "limited-scope").

Time Period Reviewed	Investment and Service	CD Loans): 01/01/01 to 12/31/04 Tests and D Loans: 09/18/01 to 11/03/05
Financial Institution		Products Reviewed
Amarillo National Bank (ANB) Amarillo, Texas		Small Loans to Businesses, Home Mortgages, Small Loans to Farms, CD Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Ty	pe of Examination	
Assessment Area	Type of Exam	Other Information
Potter-Randall Counties AA Hutchinson County AA	Full Scope Limited Scope	

# **Appendix B: Market Profiles for Full-Scope Areas**

#### **Potter-Randall Counties Assessment Area**

Demographic Information for Fu	ıll-Scope Are	ea: Potter-R	andall Coun	ties Assess	ment Area	
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	68	10.29	25.00	38.24	26.47	0.00
Population by Geography	187,547	5.52	21.53	45.68	27.27	0.00
Owner-Occupied Housing by Geography	46,132	3.70	19.91	45.36	31.03	0.00
Businesses by Geography	14,183	10.01	16.47	48.44	25.08	0.00
Farms by Geography	535	6.36	7.10	63.55	22.99	0.00
Family Distribution by Income Level	51,029	20.61	17.71	22.90	38.78	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	19,554	9.08	34.08	43.28	13.56	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$30,688 = \$44,800 = 15.23%		Median Hou Unemploym		= \$54,547 = 3.29%	

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 1990 U.S. Census, and 2002 HUD updated MFI.

#### **Potter-Randall Counties Assessment Area**

Demographic Information for F	ull-Scope A	rea: Potter-l	Randall Cou	nty Assessn	nent Area	
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	59	5.08	30.51	37.29	27.12	0.00
Population by Geography	217,858	1.86	30.21	41.88	26.06	0.00
Owner-Occupied Housing by Geography	53,485	1.25	24.08	42.03	32.63	0.00
Businesses by Geography	14,377	11.87	26.98	35.55	25.60	0.00
Farms by Geography	626	8.63	10.70	47.12	33.55	0.00
Family Distribution by Income Level	56,502	19.97	18.66	21.71	39.65	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	21,830	2.95	44.68	37.97	14.41	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below the Poverty Level	= \$43,719 = \$50,500 =13.53%		Median Hou Unemploym		= \$74,995 = 2.68%	

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2000 U.S. Census, and 2004 HUD updated MFI.

ANB's AA includes portions of the Amarillo MSA. In 2004, the U.S. Office of Management and Budget changed MSA boundaries. As a result, the Amarillo MSA, formerly Potter and Randall Counties changed to Potter, Randall, Armstrong, and Carson Counties. ANB has no banking facilities in Armstrong and Carson Counties and does not include these counties in its AA. All other census tracts in the MSA are included in the bank's AA. In this AA, ANB operates in 68 census tracts according to 1990 U.S. Census Data, and in 59 tracts according to 2000 U.S. Census Data. Included in these census tracts is the city of Amarillo. The city of Amarillo is the county seat of Potter County. The AA does not arbitrarily exclude any low- and moderate-income areas.

ANB operates 10 full-service branches and 67 proprietary ATMs in this AA. This is more than any other financial institution in the AA. ANB has consistently been ranked first in deposit market share for time periods in this evaluation period. The FDIC Summary of Deposits Market Share Report for June 30, 2002 indicates that ANB is ranked first with a 41.56 percent deposit market share. The June 30, 2003 report reflects ANB is ranked first with a 40.73 percent deposit market share. The deposit data as of June 30, 2004 indicates that ANB is ranked first with a 41.03 percent deposit market share.

Banking competition is very strong for loans, deposits, CD loans and investments in the AA, limiting opportunities for smaller institutions. Competition exists from large regional institutions, community banks, and credit unions. Major banking competitors in the Potter-Randall AA include: Bank of America, National Association which ranked 2<sup>nd</sup> in market share (13.76 percent) with seven offices; Wells Fargo Bank, National Association which ranked 3<sup>rd</sup> in deposit market share (7.34 percent) with five offices.

ANB offers a traditional line of banking products for loans and deposits. Economic conditions in the Amarillo AA remain relatively strong. Historically, the economy was built on agriculture and energy production. Amarillo's recent economic base has become more diversified to include manufacturing, industrial services, and technology development. Local economic development efforts have been focused on bringing more diversification to the area economy, including the addition of several large customer service centers and aviation-related industries. The largest employers include Tyson Foods, Regional Health Care Facilities, Pantex (Department of Energy Department disassembly and storage facility of nuclear warheads), Burlington Northern/Santa Fe Railroad, Texas Corrections Facilities and Amarillo College.

During the examination, we contacted a local housing organization and an economic development organization. The contacts indicated a continued need for affordable housing and access for small business loans. One contact stressed the importance of local bank participation in economic development lending opportunities designed to create new jobs within the community.

# **Appendix C: Tables of Performance Data**

#### **Content of Standardized Tables**

References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

- Table 1. Lending Volume Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank's assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) 5 and 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Community Development Loans" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of Assessment Area" is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- **Table 1.** Other Products Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- **Table 2. Geographic Distribution of Home Purchase Loans** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans See Table 2.
- **Table 4. Geographic Distribution of Home Mortgage Refinance Loans See Table 2.**

- **Table 5. Geographic Distribution of Multifamily Loans** Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- **Table 7. Geographic Distribution of Small Loans to Farms** The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- **Table 8. Borrower Distribution of Home Purchase Loans** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- **Table 9.** Borrower Distribution of Home Improvement Loans See Table 8.
- Table 10. Borrower Distribution of Refinance Loans See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

- Table 12. Borrower Distribution of Small Loans to Farms Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- **Table 13.** Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.
- **Table 14. Qualified Investments** Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

#### Institution ID: AMARILLO NATIONAL BANK 14206

**Table 1. Lending Volume** 

LENDING VOLUME				Geograpl	ny: TEXAS		Evaluation	on Period: S	SEPTEMBER	18, 2001 T	O NOVEMB	ER 3, 2005
	% of Rated Area	Home N	Mortgage		oans to	Small Loar	ns to Farms	Comr Developm	nunity ent Loans <sup>**</sup>		eported ans	% of Rated Area Deposits in MA/AA
MA/Assessment Area (2002):	Loans (#) in MA/AA <sup>*</sup>	# \$ (000's)		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \											
Potter-Randall 2001-2002	93.21	4,031 328,349		7,739	237,438	132	12,200	18	19,338	11,920	597,325	92.96
Potter-Randall 2003	93.49	4,031     328,349       2,397     209,629		3,417	156,281	84	8,983	26	28,644	5,924	403,537	93.76
Potter-Randall 2004	93.65	1,639	134,354	2,758	130,376	71	9,165	42	57,065	4,510	330,960	94.32
Limited Review:	- 1		1.		l .		l .				l .	
Hutchinson 2001-2002	6.79	305	19,508	560	10,658	2	97	0	0	867	30,263	7.04
Hutchinson 2003	6.51	188	12,197	222	5,070	1	75	0	0	411	17,342	6.24
Hutchinson 2004	6.35	143	8,945	159	3,283	1	75	0	0	303	12,303	5.68

For 2001-2002, Loan Data as of December 31, 2002. For 2003, Loan Data as of December 31, 2003. For 2004, Loan Data as of December 31, 2004. Rated area refers to either state

or multi-state MA rating area.

The evaluation period for Community Development Loans is from September 18, 2001 to November 3, 2005.

For 2001-2002, Deposit Data as of June 30, 2002. For 2003, Deposit Data as of June 30, 2004. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

#### Institution ID: AMARILLO NATIONAL BANK

14206

#### Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution:	TIONE TOR	OTIAGE			Geograf	ohy: TEXAS		Lvaida	tion renoc	I: JANUARY	1, 2001	10 DE	JEIVIDE	1 31, 2	<del></del>
		Home e Loans	_	ncome aphies		e-Income aphies		Income aphies	1 1	Income aphies	Marke	et Share	(%) by	Geogra	ıphy <sup>*</sup>
MA/Assessment Area:	#	% of Total <sup>**</sup>	% % BANK Owner Loans Occ Units		% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Potter-Randall 2001- 2002	1,780	91.56	3.70	0.67	19.91	8.54	45.36	51.69	31.03	39.10	16.84	5.21	10.4 4	16.6 5	20.2
Potter-Randall 2003	822	91.84	1.25	0.61	24.08	12.53	42.03	41.48	32.63	45.38	14.46	17.2 4	11.0 2	12.6 9	18.
Potter-Randall 2004	846	91.76	1.25	0.12	24.08	13.24	42.03	41.37	32.63	45.27	0.00	0.00	0.00	0.00	0.0
Limited Review:	1			l	L	L		L		l	l	I	I	I	
Hutchinson 2001-2002	164	8.44	0.00	0.00	6.65	3.05	27.97	12.80	65.38	84.15	25.42	0.00	14.2 9	21.5 7	26.
Hutchinson 2003	73	8.16	0.00	0.00	10.01	5.48	54.47	28.77	35.52	65.75	29.55	0.00	33.3 3	21.6 5	34.
Hutchinson 2004	76	8.24	0.00	0.00	10.01	11.84	29.44	10.53	60.55	77.63	0.00	0.00	0.00	0.00	0.0

<sup>\*</sup> For 2001-2002, Loan Data based on 2002 Peer Mortgage Data (Southwest Region). For 2003, Loan Data based on 2003 Peer Mortgage Data (Western). For 2004, Peer Mortgage Data was not available.

<sup>&</sup>quot;Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

For 2001-2002 Loan Data, Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information. For

<sup>2003</sup> and 2004 Loan Data, Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

#### Institution ID: AMARILLO NATIONAL BANK

14206

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution:	HOME IN	MPROVE	MENT		(	Geography:	TEXAS		Evaluation	Period: JAN	NUARY 1	, 2001 To	O DECE	MBER 31	1, 2004
MA/Assessment Area:	Total F Improve Loa	ement		ncome aphies		e-Income aphies		Income aphies		Income aphies	Ма	rket Shar	e (%) by	Geograp	ohy <sup>*</sup>
	#	% of Total <sup>**</sup>	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Potter-Randall 2001- 2002	598	96.30	3.70	3.51	19.91	28.60	45.36	41.97	31.03	25.92	51.95	68.42	72.36	45.52	46.7
Potter-Randall 2003	268	90.54	1.25	2.99	24.08	36.19	42.03	38.81	32.63	22.01	46.05	88.89	70.80	40.94	32.4
Potter-Randall 2004	329	93.73	1.25	2.13	24.08	32.52	42.03	38.60	32.63	26.75	0.00	0.00	0.00	0.00	0.0
Limited Review:											I.				1
Hutchinson 2001-2002	23	3.70	0.00	0.00	6.65	0.00	27.97	43.48	65.38	56.52	62.07	0.00	0.00	72.73	58.8
Hutchinson 2003	28	9.46	0.00	0.00	10.01	14.29	54.47	50.00	35.52	35.71	66.67	0.00	100.0	58.33	71.4
Hutchinson 2004	22	6.27	0.00	0.00	10.01	27.27	29.44	27.27	60.55	45.45	0.00	0.00	0.00	0.00	0.0

For 2001-2002, Loan Data Based on 2002 Peer Mortgage Data (Southwest Region). For 2003, Loan Data based on 2003 Peer Mortgage Data (Western). For 2004, Peer Mortgage Data was not available.

Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area. For 2001-2002 Loan Data, Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information. For 2002 and-2004 Loan Data, Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

#### Institution ID: AMARILLO NATIONAL BANK

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** 

	Total	Home	l ow-Ir	ncome	Moderate	e-Income	Middle-	Income	Upper-	Income	Mark	et Shar	e (%) by	Geogra	phv <sup>*</sup>
MA/Assessment Area:	Mortgage Geographies Refinance Loans			aphies		aphies		aphies	.viaii	or onar	o (70) by	Ooogia	Jy		
	#	% of Total <sup>**</sup>	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp						
Full Review:															
Potter-Randall 2001- 2002	1,646	93.31	3.70	0.67	19.91	6.62	45.36	43.99	31.03	48.72	17.18	10.0	10.4 3	15.6 7	20.4
Potter-Randall 2003	1,307	93.76	1.25	0.08	24.08	8.49	42.03	36.65	32.63	54.78	16.78	5.00	13.1 8	14.2 3	20.
Potter-Randall 2004	464	91.16	1.25	0.65	24.08	17.03	42.03	38.15	32.63	44.18	0.00	0.00	0.00	0.00	0.00
Limited Review:											I.				
Hutchinson 2001-2002	118	6.69	0.00	0.00	6.65	3.39	27.97	7.63	65.38	88.98	32.20	0.00	0.00	11.4 3	39.2
Hutchinson 2003	87	6.24	0.00	0.00	10.01	2.30	54.47	35.63	35.52	62.07	32.22	0.00	16.6 7	30.3 9	34.
Hutchinson 2004	45	8.84	0.00	0.00	10.01	2.22	29.44	20.00	60.55	77.78	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> For 2001-2002, Loan Data Based on 2002 Peer Mortgage Data (Southwest Region). For 2003, Loan Data based on 2003 Peer Mortgage Data (Western). For 2004, Peer Mortgage Data was not available.

<sup>&</sup>quot;Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

For 2001-2002 Loan Data, Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information. For 2002 and-2004 Loan Data, Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

#### Institution ID: AMARILLO NATIONAL BANK

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution:	MULTIF	AMILY			Geogra	phy: TEXAS		Evaluat	ion Period:	JANUARY 1	I, 2001 T	O DECE	EMBER 3	31, 2004	ļ
MA/Assessment Area:	Multif	tal amily ans		ncome aphies		e-Income aphies		Income aphies		Income aphies	Mark	et Shar	e (%) by	Geogra	phy
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Potter-Randall 2001- 2002	7	100.0 0	10.48	0.00	10.93	14.29	44.54	42.86	34.06	42.86	5.00	0.00	0.00	6.67	0.00
Potter-Randall 2003	0	0.00	2.20	0.00	28.97	0.00	38.48	0.00	30.34	0.00	0.00	0.00	0.00	0.00	0.00
Potter-Randall 2004	0	0.00	2.20	0.00	28.97	0.00	38.48	0.00	30.34	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:												l l			1
Hutchinson 2001-2002	0	0.00	0.00	0.00	29.87	0.00	14.03	0.00	56.10	0.00	0.00	0.00	0.00	0.00	0.00
Hutchinson 2003	0	0.00	0.00	0.00	46.02	0.00	7.10	0.00	46.88	0.00	0.00	0.00	0100	0.00	0.00
Hutchinson 2004	0	0.00	0.00	0.00	46.02	0.00	7.10	0.00	46.88	0.00	0.00	0.00	0.00	0.00	0.00

For 2001-2002, Loan Data Based on 2002 Peer Mortgage Data (Southwest Region). For 2003, Loan Data based on 2003 Peer Mortgage Data (Western). For 2004, Peer Mortgage Data was not available.

Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.
For 2001-2002 Loan Data, Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 1990 Census information. For 2003 and 2004 Loan Data, Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

#### Institution ID: AMARILLO NATIONAL BANK

**Table 6. Geographic Distribution of Small Loans to Businesses** 

Geographic Distribution 2004						<b>3</b>	raphy: TEX			aluation Pe		- ,			,
MA/Assessment Area:		Business Geographies Loans  # % of % of %			Moderate Geogra	e-Income aphies		Income aphies	Upper- Geogra	Income aphies	Ma	arket Sha	re (%) by	Geograph	'nу
	#	% of Total <sup>**</sup>	% of Busines ses***	% BANK Loans	Overal I	Low	Mod	Mid	Upp						
Full Review:															
Potter-Randall 2001- 2002	7,739	93.25	10.01	3.77	16.47	45.16	48.44	32.73	25.08	18.34	37.83	22.10	65.52	34.52	27.93
Potter-Randall 2003	3,417	93.90	12.08	7.23	26.76	20.46	35.81	45.07	25.35	27.25	32.63	27.91	33.05	41.62	27.23
Potter-Randall 2004	2,758	94.55	11.87	7.43	26.98	23.31	35.55	36.91	25.60	32.34	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Hutchinson 2001-2002	560	6.75	0.00	0.00	16.10	16.43	37.54	75.00	46.36	8.57	41.15	0.00	39.36	62.65	14.29
Hutchinson 2003	222	6.10	0.00	0.00	42.72	84.23	31.65	6.76	25.63	9.01	34.26	0.00	61.51	12.20	15.6
Hutchinson 2004	159	5.45	0.00	0.00	41.49	88.68	18.25	3.77	40.26	7.55	0.00	0.00	0.00	0.00	0.0

For 2001-2002, based on 2002 Peer Small Business Data - US and PR. For 2003, based on 2003 Peer Small Business Data - US and PR. For 2004, Peer Small Business Data was not available.

<sup>&</sup>quot;Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area. For 2001-2002, Source Data - Dun and Bradstreet (2002). For 2003, Source Data - Dun and Bradstreet (2004).

Appendix C-9

#### Institution ID: AMARILLO NATIONAL BANK

**Table 7. Geographic Distribution of Small Loans to Farms** 

Geographic Distribution: 2004	SMALL	LOANS 1	TO FARMS			Geography	y: TEXAS		Evaluation	on Period: J	IANUARY	′ 1, 2001	TO DEC	EMBER 3	31,
	Tota Farm			ncome aphies		e-Income aphies		Income aphies	Upper- Geogr	Income aphies	Ма	rket Shar	e (%) by	Geograp	hy
MA/Assessment Area:	#	% of Total <sup>**</sup>	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Potter-Randall 2001- 2002	132	98.51	6.36	2.27	7.10	1.52	63.55	75.76	22.99	20.45	34.65	22.22	22.22	37.36	33.33
Potter-Randall 2003	84	98.82	8.24	25.00	10.54	4.76	48.76	33.33	32.45	36.90	26.86	50.00	13.04	22.76	26.72
Potter-Randall 2004	71	98.61	8.63	22.54	10.70	2.82	47.12	38.03	33.55	36.62	0.00	0.00	0.00	0.00	0.00
Limited Review:	1				l .	l .	l .		l			I.	I.	I.	
Hutchinson 2001-2002	2	1.49	0.00	0.00	3.23	0.00	30.65	0.00	66.13	100.00	16.67	0.00	0.00	0.00	25.00
Hutchinson 2003	1	1.18	0.00	0.00	11.54	0.00	73.08	100.00	15.38	0.00	16.67	0.00	0.00	16.67	0.00
Hutchinson 2004	1	1.39	0.00	0.00	13.46	0.00	42.31	100.00	44.23	0.00	0.00	0.00	0.00	0.00	0.00

For 2001-2002, based on 2002 Peer Small Business Data -- US and PR. For 2003, based on 2003 Peer Small Business Data -- US and PR. For 2004, Peer Small Business Data was not available.

<sup>&</sup>quot;Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

For 2001-2002, Source Data - Dun and Bradstreet (2002). For 2003, Source Data - Dun and Bradstreet (2004). Appendix C-10

#### Institution ID: AMARILLO NATIONAL BANK

**Table 8. Borrower Distribution of Home Purchase Loans** 

Borrower Distribution: H	OME P	URCHAS	SE		Geo	graphy: TE	KAS	Eva	luation Peri	od: JANUAR	Y 1, 200	1 TO DE	ECEMBE	R 31, 20	004	
MA/Assessment Area:	Purc	Home chase ans	_	ncome owers	Moderate Borro			Income owers		Income owers		Mai	rket Sha	ket Share <sup>*</sup>		
	#	% of Total**	% Families**	% BANK Loans	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Overa II	Low	Mod	Mid	Upp	
Full Review:																
Potter-Randall 2001- 2002	1,78 0	91.56	20.61	6.16	17.71	13.95	22.90	27.56	38.78	52.33	20.46	18.9 1	15.7 4	19.8 4	22.7 6	
Potter-Randall 2003	822	91.84	19.75	4.67	18.55	16.41	21.67	21.97	40.03	56.94	17.28	18.2 6	17.0 8	15.1 5	18.3 8	
Potter-Randall 2004	846	91.76	19.97	9.20	18.66	17.16	21.71	24.13	39.65	49.50	0.00	0.00	0.00	0.00	0.00	
Limited Review:								l			I.					
Hutchinson 2001-2002	164	8.44	15.28	3.11	11.83	6.21	17.64	19.25	55.25	71.43	29.29	36.3 6	12.5 0	24.5 3	34.5 5	
Hutchinson 2003	73	8.16	15.07	1.39	15.72	12.50	20.80	12.50	48.41	73.61	34.95	33.3 3	32.1 4	35.2 9	35.7 1	
Hutchinson 2004	76	8.24	14.95	5.48	15.56	10.96	20.78	34.25	48.70	49.32	0.00	0.00	0.00	0.00	0.00	

For 2001-2002, based on 2002 Peer Mortgage Data (Southwest Region). For 2003, based on 2003 Peer Mortgage Data (Western). For 2004, Peer Mortgage Data was not available. As a percentage of loans with borrower income information available. For 2001-2002, no information was available for 3.2% of loans originated and purchased by bank. For 2004, no information was available for 3.5% of loans originated and purchased by bank.

For 2001-2002, percentage of Families is based on the 1990 Census information. For 2003 and 2004, percentage of Families is based on the 2000 Census information. Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

#### Institution ID: AMARILLO NATIONAL

#### **BANK 14206**

### **Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: I	IOIVIE	IIVIFKOVEI	VIEINI		G	eography: T	EXAS	_	valuation Pe	eriod: JANU	AK 1 1, 20	0110	DECEIVI	DER 31,	2004
MA/Assessment Area:	Impr	Total Home Low-Income Improvement Borrowers Loans			e-Income owers		Income owers		Income owers		Mai	ket Sha	are*		
	#	% of Total <sup>**</sup>	% Families**	% BANK Loans	% Families*	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Overa II	Low	Mod	Mid	Upp
Full Review:						•		•	•	•					
Potter-Randall 2001- 2002	598	96.30	20.61	15.54	17.71	19.43	22.90	26.01	38.78	39.02	52.23	65.0 8	61.5 4	58.5 5	43.4 8
Potter-Randall2003	268	90.54	19.75	15.38	18.55	24.23	21.67	20.38	40.03	40.00	45.86	68.7 5	55.4 5	48.7 6	33.2 0
Potter-Randall 2004	329	93.73	19.97	20.55	18.66	19.02	21.71	26.69	39.65	33.74	0.00	0.00	0.00	0.00	0.00
Limited Review:	I.					l		l		l	·				
Hutchinson 2001-2002	23	3.70	15.28	17.39	11.83	39.13	17.64	13.04	55.25	30.43	64.29	100. 0	100. 0	50.0 0	36.3 6
Hutchinson 2003	28	9.46	15.07	21.43	15.72	25.00	20.80	7.14	48.41	46.43	66.67	90.0	62.5 0	57.1 4	58.8 2
Hutchinson 2004	22	6.27	14.95	9.09	15.56	31.82	20.78	18.18	48.70	40.91	0.00	0.00	0.00	0.00	0.00

For 2001-2002, based on 2002 Peer Mortgage Data (Southwest Region). For 2003, based on 2003 Peer Mortgage Data (Western). For 2004, Peer Mortgage Data was not available. As a percentage of loans with borrower income information available. For 2001-2002, no information was available for 1.0% of loans originated and purchased by bank. For 2003, no information was available for 2.7% of loans originated and purchased by bank. For 2004, no information was available for 0.9% of loans originated and purchased by bank.

For 2001-2002, percentage of Families is based on the 1990 Census information. For 2003 and 2004, percentage of Families is based on the 2000 Census information. Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

#### Institution ID: AMARILLO NATIONAL BANK

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: F 2004	IOME N	//ORTGAC	SE REFINAN	ICE		Geograp	hy: TEXAS		Evaluati	on Period: 、	JANUAR'	Y 1, 200	1 TO DE	:CEMBE	R 31,
MA/Assessment Area:	Loans			e-Income owers		-Income owers		Income owers		Maı	rket Sha	are			
	#	% of Total**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Overa II	Low	Mod	Mid	Upp
Full Review:			l			•				l	·				
Potter-Randall 2001- 2002	1,64 6	93.31	20.61	2.64	17.71	10.64	22.90	22.72	38.78	64.00	20.88	14.3 9	18.6 9	20.4 0	21.8 7
Potter-Randall 2003	1,30 7	93.76	19.75	3.37	18.55	9.63	21.67	20.20	40.03	66.80	21.63	23.9 4	20.9 2	20.6 5	21.9 9
Potter-Randall 2004	464	91.16	19.97	8.87	18.66	19.51	21.71	24.83	39.65	46.78	0.00	0.00	0.00	0.00	0.00
Limited Review:			l .							l.	I.				
Hutchinson 2001-2002	118	6.69	15.28	0.00	11.83	4.42	17.64	10.62	55.25	84.96	38.26	0.00	25.0 0	32.0 0	40.3 4
Hutchinson 2003	87	6.24	15.07	2.30	15.72	1.15	20.80	16.09	48.41	80.46	38.33	42.8 6	17.6 5	45.2 4	38.5 1
Hutchinson 2004	45	8.84	14.95	4.55	15.56	9.09	20.78	11.36	48.70	75.00	0.00	0.00	0.00	0.00	0.00

For 2001-2002, based on 2002 Peer Mortgage Data (Southwest Region). For 2003, based on 2003 Peer Mortgage Data (Western). For 2004, Peer Mortgage Data was not available. As a percentage of loans with borrower income information available. For 2001-2002, no information was available for 3.5% of loans originated and purchased by bank. For 2004, no information was available for 2.2% of loans originated and purchased by bank.

For 2001-2002, percentage of Families is based on the 1990 Census information. For 2003 and 2004, percentage of Families is based on the 2000 Census information.

Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

#### Institution ID: AMARILLO NATIONAL BANK

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: S 2004						ny: TEXAS	Evaluation Period: JANU.	, _00			
		Small ns to nesses	Business Revenues o or I	f \$1 million	Loans by (	Original Amount Regardles	ss of Business Size	Market Share			
	#	% of Total**	% of Businesses	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less		
MA/Assessment Area:											
Full Review:											
Potter-Randall 2001- 2002	7,739	93.25	75.41	33.34	94.87	3.10	2.03	37.83	34.64		
Potter-Randall 2003	3,417	93.90	66.33	32.60	91.31	5.36	3.34	32.63	29.93		
Potter-Randall 2004	2,758	94.55	67.05	37.09	90.61	5.26	4.13	0.00	0.00		
Limited Review:					•						
Hutchinson 2001-2002	560	6.75	77.69	25.18	98.21	0.71	1.07	41.15	42.86		
Hutchinson 2003	222	6.10	62.96	15.32	96.85	2.25	0.90	34.26	19.66		
Hutchinson 2004	159	5.45	64.39	11.32	98.11	1.26	0.63	0.00	0.00		

For 2001-2002, based on 2002 Peer Small Business Data -- US and PR. For 2003, based on 2003 Peer Small Business Data - US and PR. For 2004, Peer Small Business Data was not available.

<sup>&</sup>quot;Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
"For 2001-2002, Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002). For 2003, Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B -2003. For 2004, Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B-2004).

Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. For 2001-2002, no information was available for 0.00% of small loans to businesses originated and purchased by the bank. For 2003, no information was available for 0.00% of small loans to businesses originated and purchased by the bank. For 2004, no information was available for 0.21% of small loans to businesses originated and purchased by the bank.

#### Institution ID: AMARILLO NATIONAL BANK

14206

#### **Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: S	MALLIC	ANS TO F	FARMS		Geography:	TEXAS	Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 200					
Demover Distribution.	Total		_	Revenues of or less		y Original Amount Regard		·	ket Share			
MA/Assessment Area:	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less			
Full Review:	I											
Potter-Randall 2001- 2002	132	98.51	91.03	79.55	75.76	15.91	8.33	34.65	38.17			
Potter-Randall 2003	84	98.82	91.43	86.90	64.29	28.57	7.14	26.86	29.27			
Potter-Randall 2004	71	98.61	90.58	84.51	59.15	25.35	15.49	0.00	0.00			
Limited Review:												
Hutchinson 2001-2002	2	1.49	96.77	100.00	100.00	0.00	0.00	16.67	25.00			
Hutchinson 2003	1	1.18	96.15	100.00	100.00	0.00	0.00	16.67	16.67			
Hutchinson 2004	1	1.39	98.08	100.00	100.00	0.00	0.00	0.00	0.00			

<sup>\*</sup> For 2001-2002, based on 2002 Peer Small Business Data -- US and PR. For 2003, based on 2003 Peer Small Business Data -- US and PR. For 2004, Peer Small Business Data was not available.

Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

For 2001-2002, Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002). For 2003, Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B – 2004).

Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. For 2001-2002, No information was available for 0.00% of small loans to farms originated and purchased by the bank. For 2003, No information was available for 0.00% of small loans to farms originated and purchased by the bank. For 2004, No information was available for 0.00% of small loans to farms originated and purchased by the bank.

#### Institution ID: AMARILLO NATIONAL BANK

14206

#### **Table 14. Qualified Investments**

QUALIFIED INVESTME	NTS		Geogr	aphy: TEXAS	Evalua	ntion Period: SEPTE	MBER 18, 2001	TO NOVEMBE	R 4, 2005	
MA/Assessment Area:	Prior Perio	od Investments*	Current Perio	od Investments		Total Investments		Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
Full Review:										
Potter-Randall	3	328	255	9,339	258	9,667	99.70	3	8,425	
Limited Review:								•		
Hutchinson Co	0	0	19	29	19	29	0.30	0	0	

<sup>&#</sup>x27;Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

#### Institution ID: AMARILLO NATIONAL BANK

14206

# Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BR 2001 TO DECEMBER 3	-	ELIVERY	SYSTEM /	AND BRA	ANCH OF	PENING	S/CLOSI	NGS	Geo	graphy: T	EXAS		Eva	luation P	eriod: SE	EPTEMBE	ER 18,
	Deposi ts			Brancl	hes				Branc	h Openii	ngs/Closi	ngs			Popu	lation	
MA/Assessment Area:	% of Rated Area	# of BANK Branch	% of Rated Area		ation of I			# of Branch	# of Branch	Net	change i Bran (+ c		n of	% of	Population Geog	on within E raphy	∃ach
	Deposi ts in AA	es	Branch es in AA	Low	Mod	Mid	Upp	Openin gs	Closin gs	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Potter-Randall	92.96	9	92.31	33.33	0.00	11.11	55.56	0	0	0	0	0	0	5.52	21.53	45.68	27.27
Limited Review:	•		1				•						'				
Hutchinson	7.04	1	7.69	0.00	100.0 0	0.00	0.00	0	0	0	0	0	0	0.00	8.99	27.40	63.61

### Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BR TO NOVEMBER 4, 2005	_	ELIVERY	SYSTEM /	AND BRA	ANCH OF	PENINGS	S/CLOSII	NGS	Geog	graphy: T	EXAS		Eva	luation P	<b>eriod</b> : JA	NUARY1	, 2003
	Deposi ts			Brancl	nes				Branc	h Openii	ngs/Closi	ngs			Popul	lation	
MA/Assessment Area:	% of Rated Area	# of BANK Branch	% of Rated Area		Location of Branches by Income of Geographies (%)				Net change in Location of % of Population of # of Branches Geogra					∃ach			
	Deposi ts in AA	es	Branch es in AA	Low	Mod	Mid	Upp	Openin gs	Closin gs	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Potter-Randall	93.76	10	90.91	10.00	30.00	10.00	50.00	1	0	0	0	0	1	1.86	30.21	41.88	26.06
Limited Review:		•			•		•		•	•			•	•	•	•	

Hutchinson	6.24	1	7.69	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	12.99	51.82	35.20
					0												